

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
CIRCUIT COURT

Mikell R. Scarborough, Master-in-Equity

Case No. 2015-CP-10-06684
Appellate Case No. 2025-001339

RECEIVED

Aug 10 2026

SC Court of Appeals

Palmetto Contract Services, Inc.....Appellant,

v.

Zurich American Insurance Company of Illinois.....Respondent.

MOTION FOR EXTENSION TO FILE FINAL BRIEF

Appellant, by and through its undersigned attorney hereby moves this Honorable Court for a 3-day extension in which to file its Final Brief which was due August 10, 2026. If the extension is granted the Final Brief will be due August 13, 2026. This motion is based on Counsel for Respondents pre-planned family vacation starting July 13-17, 2026 and July 27 through August 7, 2026 and the relative complexity of the issues on appeal that are involved in this case and Counsel's busy trial and deposition schedule upon his return.

SIGNATURE TO FOLLOW ON NEXT PAGE

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr. (73789)

2309 Devine Street

Columbia, SC 29205

(803) 251-4517

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jgoodwyn@goodwynlaw.com

Attorney for Appellant

Columbia, South Carolina
August 10, 2026

The Supreme Court of South Carolina



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SC Court of Appeals

Secure Leave Confirmation

Thomas Jefferson Goodwyn Jr., Bar No. 73789, has requested secure leave for the following weeks:

Secure Leave Date	Request Date
August 03, 2026 - August 07, 2026	11/26/2025 11:22 AM
July 27, 2026 - July 31, 2026	11/26/2025 11:21 AM
July 13, 2026 - July 17, 2026	11/26/2025 11:22 AM
July 07, 2025 - July 11, 2025	4/11/2025 11:03 AM

Print or save your Secure Leave Confirmation. In the event a court proceeding is scheduled in error, you will need to transmit this form to the clerk of the relevant court and all other parties in the case.

IN THE STATE OF SOUTH CAROLINA
In the Circuit Court

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APPEAL FROM CHARLESTON CIRCUIT COURT **SC Court of Appeals**

Mikell Scarborough, Circuit Court Judge

Circuit Court Case No.: 2015-CP-10-06684
Appellate Case No.: 2025-001339

Palmetto Contract Services, Inc.Appellant,

v.

Zurich American Insurance Company of Illinois
.....Respondent.

PROOF OF SERVICE

I certify that I have served a copy of **Appellant's Motion for Extension**, on the following
via email address and facsimile on August 10, 2026.

Larry D. Cohen, Esquire Larry D. Cohen, LLC ldcohen@ldcohenlaw.com	Carolyn H. Blue, Esquire carolyn.blue@ymail.com
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GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

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Attorney for Appellant

T. Jeff Goodwyn, Jr.*†
Jefferson D. Turnipseed**

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** Of Counsel

Email: JGoodwyn@Goodwynlaw.com
Web: www.GoodwynLaw.com

August 10, 2026

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SC Court of Appeals

VIA E-FILING AND MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: ***Palmetto Contract Services, Inc. v Zurich American Insurance Company of Illionis***
Case No.: 2015-CP-10-06684
Appellate Case No.: 2025-001339
Our File No.: 3000-00691

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the **Appellant's Motion for Extension, along with Proof of Service** for filing in connection with the above-referenced matter. The \$50.00 filing fee has been placed in today's mail.

I have copied all interested parties with a copy of this letter as evidenced below.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr.

TJG:cnc

cc: Carolyn H. Blue, Esquire
Larry D. Cohen, Esquire
(all via email)